

1 AMANDA C. YEN, ESQ. (NSBN 9726)
2 KRISTEN T. GALLAGHER (NSBN 9561)
3 McDONALD CARANO LLP
4 2300 West Sahara Avenue, Suite 1200
5 Las Vegas, Nevada 89102
6 Telephone: (702) 873-4100
7 ayen@mcdonaldcarano.com
8 kgallagher@mcdonaldcarano.com

5 DARIUSH KEYHANI (*pro hac vice* to be submitted)
6 MEREDITH & KEYHANI, PLLC
7 125 Park Avenue, 25th Floor
New York, New York 10017
dkeyhani@meredithkeyhani.com

6 *Attorneys for Plaintiffs LT Game (Canada) Limited*
9 and *LT Game Limited*

LT GAME (CANADA) LIMITED and
LT GAME LIMITED,

Plaintiffs.

SCIENTIFIC GAMES CORPORATION,

Defendant.

Case No.: 2:17-cv-01015 JAD-CWH

**MOTION TO EXTEND TIME TO FILE
PRO HAC VICE APPLICATION OF
NON-RESIDENT ATTORNEY DARIUSH
KEYHANI**

(Fourth Request)

20 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Local Rule IA 6-1 and 11-
21 2, plaintiffs LT Game (Canada) Limited (“LT Game Canada”) and LT Game Limited (“LT Game”)
22 (collectively, “Plaintiff”) hereby request an order granting additional time for non-resident attorney
23 Dariush Keyhani, Esq. to file his Designation of Local Counsel and Verified Petition (“Verified
24 Petition”) in the above-captioned matter and asks the Court for an additional extension within
25 which to file the application.

26 This Motion is based upon the below Memorandum of Points and Authorities, and the
27 pleadings and papers on file herein. Plaintiff submits that no hearing is required for this Motion as
28 Defendant has not appeared in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTS

On April 7, 2017, Plaintiff, through its Nevada counsel, filed a Complaint in this matter. [ECF No. 1]. Plaintiff included on the caption Mr. Keyhani's name, as well, both out of respect to Mr. Keyhani and in anticipation of his likely eventual appearance in the matter. While Mr. Keyhani has never actually appeared, the inclusion of his name on the Complaint triggered the court's 45-day deadline to submit a designation of local counsel. [ECF No. 4]. Pursuant to the Notice to Counsel Pursuant to Local Rule IA 11-2, Mr. Keyhani's Verified Petition was due on May 25, 2017. *Id.*

Subsequent to filing the Complaint, the parties began settlement negotiations. As settlement appeared imminent, Plaintiff filed a first request to extend time to apply pro hac vice (the “First Request”) on May 25, 2017 [ECF No. 7]. This Court granted the First Request on May 26, 2017 [ECF No. 8]. On July 20, 2017, Plaintiff filed its second request to extend time to apply pro hac vice (the “Second Request”) [ECF No. 10] which was granted by this Court on July 24, 2017 [ECF No. 12]. Pursuant to that Order, this Court extended the deadline for Mr. Keyhani to apply for pro hac vice admission to September 7, 2017. [ECF No. 12]. Plaintiff filed its third request on August 31, 2017 seeking another 30-day extension to October 6, 2017 [ECF No. 13] which was granted by this Court on September 1, 2017 [ECF No. 15].

Plaintiff now moves for an additional extension of the time to file Mr. Keyhani's Verified Petition, and, respectfully, Plaintiff seeks this extension for good cause. Specifically, Plaintiff seeks this extension because Plaintiff and defendant Scientific Games Corporation ("Scientific Games") are in the final stages of negotiating a settlement agreement and expect to have their settlement fully executed within the next two weeks; thus, Mr. Keyhani's appearance in this matter would be unnecessary. Accordingly, Plaintiff respectfully requests this court extend the deadline to submit the Verified Petition from October 6, 2017 to and including **November 6, 2017**.

II. LEGAL ARGUMENT

An attorney seeking admission pro hac vice must associate with local counsel and apply for admission “within 45 days of his or her first appearance.” *See* LR IA 11-2(e). A party seeking

1 to extend the time with which to comply with the requirements of LR IA 11-2 must file a motion
2 “stat[ing] the reasons for the extension requested and...inform[ing] the court of all previous
3 extensions of” time to comply with LR IA 11-2 the court has granted. *See* LR IA 6-1. Here, there
4 are two reasons for the Court to grant this extension.

5 First, Mr. Keyhani has never “appeared” in this matter. While Plaintiff’s Nevada counsel
6 included Mr. Keyhani’s name on the Complaint out of respect, Mr. Keyhani has not signed or
7 filed anything in this matter, nor has he entered an appearance in court. Second, Plaintiff and
8 Scientific Games are nearing a final settlement, and believe that the execution of a formal
9 settlement agreement will be completed within the next two weeks. Indeed, the parties are
10 currently negotiating the last few provisions of the agreement. If Plaintiff is successful in settling
11 this matter without further litigation, Mr. Keyhani’s Verified Petition will be unnecessary. Thus,
12 Plaintiff seeks this extension to save resources and the court’s time.

13 Accordingly, Plaintiff therefore requests this court extend the deadline for Plaintiff and
14 Mr. Keyhani to comply with the requirements of LR IA 11-2 **from October 6, 2017 to November**
15 **6, 2017** to allow the parties time to finalize settlement of this matter and determine whether such
16 admission will be necessary.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **III. CONCLUSION**

2 For the foregoing reasons, Plaintiff respectfully requests an extension of time for non-
3 resident attorney Dariush Keyhani to submit his Verified Petition.

4 DATED this 4th day of October, 2017.

5 McDONALD CARANO LLP

6 By: /s/Amanda C. Yen
7 Amanda C. Yen, Esq. (NSBN 9726)
8 Kristen T. Gallagher, Esq. (NSBN 9561)
9 2300 West Sahara Avenue, Suite 1200
10 Las Vegas, Nevada 89102
11 Telephone: (702) 873-4100
12 ayen@mcdonaldcarano.com
13 kgallagher@mcdonaldcarano.com

14 Dariush Keyhani (*pro hac vice* to be submitted)
15 MEREDITH & KEYHANI, PLLC
16 125 Park Avenue, 25th Floor
17 New York, New York 10017
18 Telephone: (212) 760-0098
19 dkeyhani@meredithkeyhani.com

20 *Attorneys for Plaintiffs LT Game (Canada) Limited and*
21 *LT Game Limited*

22 IT IS SO ORDERED:

23 _____
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 4th day of October, 2017, a true and correct copy of the foregoing **MOTION TO EXTEND TIME TO FILE PRO HAC VICE APPLICATION OF NON-RESIDENT ATTORNEY DARIUSH KEYHANI (FOURTH REQUEST)** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/Jelena Jovanovic
An employee of McDonald Carano LLP



2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA 89102
PHONE 702.873.4100 • FAX 702.873.9966